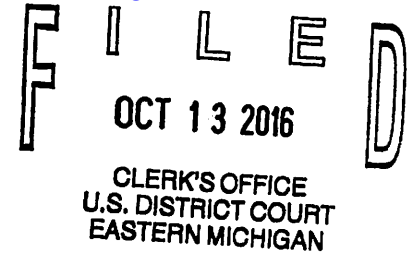


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION



UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 15-20661

v.

HON. MATTHEW LEITMAN

KEITH ALAN MOORE

Defendant.

_____ /

Stipulation Regarding Restitution

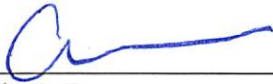
The defendant pleaded guilty to producing child pornography on February 18, 2016. Approximately 40,000 images and 500 videos of child pornography were recovered from a forensic examination of Defendant's computer media. The images included previously-identified child pornography victims, known as: (1) Violet; (2) Andy; (3) Cindy; (4) Jane; and (5) 8Kids series.

IT IS AGREED AND STIPULATED between the undersigned counsel for the government and the undersigned counsel for the defendant, with defendant's express consent, that these individuals are victims of defendant's offense conduct,

as defined under 18 U.S.C. §§ 2259 and 3664, and that a restitution award will be included in defendant's judgment as follows:

- \$3,000 for the victim Violet payable to Carol L. Hepburn in trust for "Violet" at 200 First Avenue West, Suite 550, Seattle, WA 98119;
- \$3,000 for the victim Andy payable to Marsh Law Firm PLLC in trust for "Andy" at 548 Market Street, #65135, San Francisco, CA 94104;
- \$3,000 for the victim Cindy payable to Cusack, Gilfillan & O'Day, LLC for "Cindy" at 415 Hamilton Boulevard, Peoria, IL 61602;
- \$3,000 for the victim in the Cinder Block Blue series payable to Marsh Law Firm PLLC in trust for "Jane" at PO Box 4668 #65135, New York, New York, 10163;
- \$15,000 to be divided evenly amongst the victims in the 8Kids series payable to "The Law Officer of Erik Bauer in trust for the 8 Kids Series" at 215 Tacoma Avenue South, Tacoma, WA 98402.

The parties respectfully request that, as part of defendant's judgment, the Court enter a restitution order consistent with this stipulation.



April N. Russo
Assistant United States Attorney



Richard Helfrick
Counsel for Defendant



Keith Moore
Defendant

Dated: 10-13-16